



Alan C. Lloyd, Ph.D.
Agency Secretary

California Environmental Protection Agency

Air Resources Board • Department of Pesticide Regulation • Department of Toxic Substances Control
Integrated Waste Management Board • Office of Environmental Health Hazard Assessment
State Water Resources Control Board • Regional Water Quality Control Boards



Arnold Schwarzenegger
Governor

Certified Mail: 7000 0600 0027 1155 2895

March 29, 2006

Mr. Reuben Sendejas, Environmental Health Specialist II
Tuolumne County Environmental Health
2 South Green Street
Sonora, California 95370

Dear Mr. Reuben Sendejas:

The California Environmental Protection Agency (Cal/EPA), Office of Emergency Services, Office of the State Fire Marshal, Department of Toxic Substances Control, and the State Water Resources Control Board conducted a program evaluation of Tuolumne County Environmental Health's Certified Unified Program Agency (CUPA) on March 22 and 23, 2006. The evaluation was comprised of an in-office program review and field inspections. The state evaluators completed a Certified Unified Program Agency Evaluation, Summary of Findings with your agency's program management staff, which includes identified deficiencies, preliminary corrective actions and timeframes. Two additional evaluation documents are the Program Observations and Recommendations and the Examples of Outstanding Program Implementation. I have reviewed the enclosed copy of the Summary of Findings and I find that Tuolumne County Environmental Health's program performance is unsatisfactory with improvement needed. Cal/EPA's Unified Program staff will coordinate with your agency to track the correction of any identified deficiencies over the time frame and schedule included in the Summary of Findings.

Thank you for your continued commitment to the protection of public health and the environment. If you have any questions or need further assistance, you may contact Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or jbohon@calepa.ca.gov.

Sincerely,

Don Johnson
Assistant Secretary
California Environmental Protection Agency

Enclosures
cc: See next page

Reuben Sendejas
March 29, 2006
Page 2

cc: Mr. Reuben Sendejas, Environmental Health Specialist II (Sent Via Email)
Tuolumne County Environmental Health
2 South Green Street
Sonora, California 95370

Ms. Marcele Christofferson (Sent Via Email)
State Water Resources Control Board
P.O. Box 944212
Sacramento, California 94244-2102

Mr. Mark Pear (Sent Via Email)
Department of Toxic Substance Control
700 Heinz Avenue, Suite 210
Berkeley, California 94710-2721

Mr. Francis Mateo (Sent Via Email)
Office of the State Fire Marshal
P.O. Box 944246
Sacramento, California 94244-2460

Mr. Jack Harrah (Sent Via Email)
Governor's Office of Emergency Services
P.O. Box 419047
Rancho Cordova, California 95741-9047

Ms. Liz Haven (Sent Via Email)
State Water Resources Control Board
P.O. Box 944212
Sacramento, California 94244-2102

Mr. Charles McLaughlin (Sent Via Email)
Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

Ms. Vickie Sacamoto (Sent Via Email)
Office of the State Fire Marshal
P.O. Box 944246
Sacramento, California 94244-2460

Mr. Moustafa Abou-Taleb (Sent Via Email)
Governor's Office of Emergency Services
P.O. Box 419047
Rancho Cordova, California 95741-9047



STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY



Alan C. Lloyd, Ph.D.
Agency Secretary

CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION
SUMMARY OF FINDINGS

Arnold
Schwarzenegger
Governor

CUPA: Tuolumne County Environmental Health

Evaluation Date: March 22 and 23, 2006

EVALUATION TEAM

Cal/EPA: Kareem Taylor

SWRCB: Marcele Christofferson

OES: Jack Harrah

DTSC: Mark Pear

OSFM: Francis Mateo

This Summary of Findings includes the deficiencies identified during the evaluation, observations and recommendations for program improvement, and examples of outstanding program implementation activities. The evaluation findings are preliminary and subject to change upon review by state agency and CUPA management. Questions or comments can be directed to Kareem Taylor at (916)327-9557.

	<u>Deficiency</u>	<u>Preliminary Corrective Action</u>	<u>Timeframe</u>
1	The CUPA has not conducted a self-audit of its Unified Program activities from FY 00/01 through FY 03/04. The self-audit is an important part of the evaluation process because it highlights areas in the program where the CUPA has shown growth, as well as, areas that require improvement. The self-audit will assist the CUPA in setting tangible goals for UP implementation.	Title 27 Article 6. (a)(1): “The CUPA shall conduct an annual self-audit at the end of each state fiscal year. Annual self-audit reports shall be completed by September 30 of each year. The time period covered by each self-audit is the state fiscal year from July 1 through June 30 of each year.” Please refer to the Unified Program Self-Auditing Procedures sent via email March 14, 2006 for guidance.	September 30, 2006
2	The FY 04/05 self-audit submitted during the CUPA evaluation did not contain all of the required elements.	Include the required elements in a descriptive, narrative fashion into the self-audit.	September 30, 2006

	<p>The Self-Audit shall include but not be limited to:</p> <ol style="list-style-type: none"> 1. Summary of findings 2. Report of deficiencies with a plan of correction 3. Narrative summary of program element activities, including the effectiveness and efficiency of permitting, inspection, and enforcement activities undertaken 4. Copies of the annual, biennial, and quarterly summary reports (Reports 1-6) 5. Summary of single fee system activities 6. Narrative summary of progress made towards consolidating, coordinating, and making consistent the Unified Program 7. A record of changes in local ordinances, resolutions, and agreements affecting the Unified Program 8. Narrative summary of the annual review and update of the fee accountability program 9. A summary of new programs being included in the Unified Program 10. A demonstration that the CUPA has satisfied the specific self-audit and performance standards established in regulation by the Secretary or the state agencies responsible for one or more of the program elements <p>CalARP Program self-audit elements are also found in T19 2780.5. Specifically: An audit report shall be compiled annually based upon the previous fiscal year's activities and shall contain an executive summary and a brief description of how the AA is meeting the requirements of the program as listed in Section 2780.3. The audit shall include but is not limited to the following information:</p> <ol style="list-style-type: none"> (1) a listing of stationary sources which have been audited. (2) a listing of stationary sources which have been requested to develop RMPs. (3) a listing of stationary sources which have been inspected. 		
--	---	--	--

	<p>(4) a listing of stationary sources which have received public comments on the RMP.</p> <p>(5) a list of new or modified stationary sources.</p> <p>(6) a summary of enforcement actions initiated by the AA identifying each stationary source.</p> <p>(7) a summary of the personnel and personnel years necessary to directly implement, administer, and operate the CalARP Program.</p> <p>(8) a list of those stationary sources determined by the AA to be exempt from the chapter pursuant to Section 25534(b)(2).</p>		
3	<p>The CUPA is not inspecting HMRRP facilities once every three years. Of 10 Business Plan files reviewed, only 5 had inspection forms dated within the past three years.</p> <p>In FY 04/05, the CUPA had 21 routine inspections out of 251 businesses (8%).</p> <p>In FY 03/04, the CUPA had 50 routine inspections out of 259 businesses (19%).</p> <p>In FY 02/03, the CUPA had 52 routine inspections out of 252 businesses (21%).</p>	Inspect HMRRP facilities once every three years.	March 23, 2007
4	<p>The CUPA is not inspecting Hazardous Waste Generators once every three years.</p> <p>In FY 04/05, the CUPA had 17 routine inspections out of 143 businesses (12%).</p> <p>In FY 03/04, the CUPA had 34 routine inspections out of 147 businesses (23%).</p> <p>In FY 02/03, the CUPA had 24 routine inspections out of 146 businesses (21%).</p>		March 23, 2007

	<p>The CUPA has inspected approximately 53% of all known facilities generating hazardous waste over the past three fiscal years. A random review of the files reflects this. For instance, Stan and Jim's Body Shop was last inspected on 01/10/1995, Tom Martin Logging was last inspected on 01/12/2000, Mother Lode Equipment Inc. was last inspected on 12/01/2000, Montezuma Aggregate was last inspected on October 10, 2000, Cal Trans – Jamestown was last inspected on 06/13/2001, and Columbia College was last inspected on 05/16/2002. Improvement needs to be made The CUPA shall complete inspections of all facilities including tiered permitted facilities within its three year inspection cycle.</p>	Inspect Hazardous Waste Generators once every three years.	
5	<p>The CUPA is not inspecting Underground Storage Tank facilities once a year.</p> <p>In FY 04/05, the CUPA had 12 routine inspections out of 41 businesses (29%).</p> <p>In FY 03/04, the CUPA had 18 routine inspections out of 42 businesses (43%).</p> <p>In FY 02/03, the CUPA had 27 routine inspections out of 46 businesses (59%).</p>	Inspect Underground Storage Tank facilities once every year.	March 23, 2007
6	<p>The CUPA is not implementing and updating their Inspection and Enforcement Plan as mandated by law. Examples of this include: lack of a training plan, not administering formal enforcement for non-minor violations, and lack of organization and efficiency in the SWEEPS electronic filing system.</p> <p>Title 27 15200 (f) The applicant agency shall develop and the Certified Unified Program Agency shall implement an Inspection and Enforcement Program Plan. The Inspection and Enforcement Program Plan shall be prepared in cooperation with all proposed participating agencies of the jurisdiction and shall contain provisions for administering all program elements.</p> <p>(3) The Inspection and Enforcement Program plan</p>	Read and follow the CUPA Inspection and Enforcement Plan. Update the program as needed.	June 23, 2006

	<p>shall at a minimum be annually reviewed by the CUPA.</p> <p>(B) The CUPA shall prepare a summary of the annual plan review. The summary shall discuss effectiveness and efficiency of the Inspection and Enforcement Program activities for the prior year.</p> <p>(4) The CUPA shall update the plan as necessary.</p>		
7	<p>The CUPA has a plan in their Inspection and Enforcement Program Plan for administering formal enforcement; however, during the evaluation, it was stated that the CUPA was not prepared to administer formal enforcement to facilities cited for non-minor violations.</p> <p>Title 27 15200 (f) The applicant agency shall develop and the Certified Unified Program Agency <u>shall implement</u> an Inspection and Enforcement Program Plan.</p>	Read and follow the CUPA Inspection and Enforcement Plan.	June 23, 2006
8	<p>The CUPA is not documenting that all facilities that have received a notice to comply citing minor violations have returned to compliance within 30 days of notification. There is no recorded certification of return to compliance in the files from the facilities cited for minor violations.</p> <p>For the inspection conducted on 05/14/02 at Pacific Bell no Return to Compliance Certificate or re-inspection report could be found in the file.</p> <p>For the inspection conducted on 05/25/05 at Sonora Trucking no Return to Compliance Certificate or re-inspection report could be found in the file.</p> <p>For the inspection conducted on 06/01/05 at Dan's Distributing no Return to Compliance Certificate or re-inspection report could be found in the file.</p> <p>HSC: 25404.1.2. (c) (1) A person who receives a notice to comply detailing a minor violation shall have not more than 30 days from the date of the notice to comply in which to correct any violation cited in the notice to comply. Within five working days of correcting the violation, the person cited or an authorized representative shall sign the notice to</p>	Obtain return to compliance certification from facilities found to have minor violations. The CUPA shall ensure that those businesses that have not submitted the appropriate documentation are re-inspected with the appropriate enforcement taken to remedy each uncorrected violation. HSC, section 25187.8(g)(1) states that if a business fails to comply with a notice of violation within the prescribed period (30 days) the CUPA may take any needed enforcement action.	March 23, 2006

	comply, certifying that any violation has been corrected, and return the notice to the UPA.		
9	<p>The CUPA is not implementing a fee accountability program as mandated by law. A fee accountability program will assist the CUPA in budgeting for program changes like adding more staff and implementing Envision software into the program. It is also important for keeping track of program activities.</p> <p>Title 27 15210 (b) Each CUPA shall implement a fee accountability program designed to encourage more efficient and cost-effective operation of the program for which the single fee and surcharge are assessed.</p> <p>(1) The fee accountability program shall be instituted before the single fee system. The fee accountability program shall include at a minimum the following elements:</p> <p>(A) A procedure of accounting for: the fee schedule, the actual amount billed, and the revenue collected.</p> <p>(B) Discrete billable services, categorized as either site specific or general.</p> <p>(C) Staff work hours required to implement the program.</p> <p>(D) Direct program expenses including durable and disposable equipment.</p> <p>(E) Indirect program expenses including overhead for facilities and administrative functions.</p> <p>(F) The number of regulated businesses in each program element within the jurisdiction.</p> <p>(G) Total number of regulated businesses in the jurisdiction.</p> <p>(H) Quantity and range of services provided, including frequency of inspection.</p> <p>(2) The CUPA and participating agencies shall annually review and update the fee accountability program.</p>	Implement a fee accountability program consistent with the law.	June 23, 2006
10	The CUPA has not inspected all (both) CalARP	Inspect all CalARP facilities	March 23, 2007

	facilities within the past three years.	once every three years.	
11	The CUPA is not obtaining inventories or inventory certification annually from all businesses subject to the Business Plan Program, per T19 2729.4 and 2729.5. Of 10 Business Plan files reviewed, only 4 had current inventories or inventory certification.	Ensure that the next inventory submission is complete and correct.	March 23, 2007
12	The CUPA is not ensuring that inventories are complete and correct, per T19 2729.2(a)(3). 7 of the 10 Business Plan files reviewed had incomplete inventories, missing information, missing Business Activities forms or used older Owner/Operator Identification or Chemical Description forms that do not have all the required fields.	Ensure that the next inventory is and submission is complete and correct.	March 23, 2007
13	The CUPA is not ensuring that Business Plans are being reviewed every three years, per HSC 25505(c). None of the 10 Business Plan files reviewed contained a certification of review.	Ensure that any business plan more than three years old has a certification of review or that a new business plan is submitted.	March 23, 2007
14	The Business Plan files, for the most part, have the site maps and exact chemical locations sequestered in an envelope marked "Confidential", to ensure that this information is not disclosed to the public, per HSC 25506(a). However, in many cases, earlier versions of the Business Plan in the folder still have maps and exact chemical locations available for public inspection.	Ensure that ALL maps and exact chemical locations are protected from disclosure during public inspection.	January 1, 2007
15	The CUPA failed to take formal enforcement for the inspection conducted on 05/16/02 at Columbia College. On the day of inspection, personnel from the Tuolumne County Division of Environmental Health visited the college, where it was observed that waste absorbent from the auto-tech had been disposed into the solid waste stream. A Class I violation means any of the following under		March 23, 2006

	<p>HSC section 25110.8.5:</p> <p>(a) A deviation from the requirements of this chapter, or any regulation, standard, requirement, or permit or interim status document condition adopted pursuant to this chapter, that is any of the following:</p> <p>(1) The deviation represents a significant threat to human health or safety or the environment because of one or more of the following:</p> <p>(A) The volume of the waste.</p> <p>(B) The relative hazardousness of the waste.</p> <p>(C) The proximity of the population at risk.</p> <p>(2) The deviation is significant enough that it could result in a failure to accomplish any of the following:</p> <p>(A) Ensure that hazardous waste is destined for, and delivered to, an authorized hazardous waste facility.</p> <p>(B) Prevent releases of hazardous waste or constituents to the environment during the active or post closure period of facility operation.</p> <p>(C) Ensure early detection of releases of hazardous waste or constituents.</p> <p>(D) Ensure adequate financial resources to pay for facility closure.</p> <p>(F) Perform emergency cleanup operations of, or other corrective action for releases.</p> <p>(b) The deviation is a Class II violation which is a chronic violation or committed by a recalcitrant violator. "Class II Violation" has the same meaning as defined in Section 66260.10 of Title 22 of the California Code of Regulations.</p>	<p>In the future, any Class I violation must be addressed through a formal enforcement action according to the State Enforcement Response Policy. For assistance in using DTSC Enforcement Response Policy EO-02-003-PP, please contact your DTSC CUPA liaison.</p>	
16	<p>The CUPA did not conduct a complete oversight inspection. During the inspection, the following was noted:</p> <ol style="list-style-type: none"> 1) Inspector inadvertently overlooked that accumulation start dates had not been posted on numerous empty product drums and containers greater than 5 gallons in size scattered throughout the facility as required by Title 22 Section 66261.7(f). 2) Inspector failed to determine whether the facility was a large quantity generator (> 1000 kilograms in any calendar month) of 	Corrected on site	Completed

	<p>hazardous waste by totaling all hazardous waste generated at the site from the facility's bills of lading and manifests of waste antifreeze, waste oil, waste diesel, and used oil filters. As a consequence, the inspector was unable to determine whether Title 22 Section 66262.34 (a) was applicable.</p> <p>3) Inspector failed to determine as a consequence whether the facility was required to maintain a written daily inspection log for the waste oil tank on the site as required of large quantity generators under Title 22 Section 66265.195(c).</p> <p>4) Inspector failed to determine as a consequence whether the owner was required to keep a written tank assessment for the waste oil tank on file certified by a qualified engineer registered in California as required by Title 22 Section 66265.192.</p>		
17	<p>During the day of the oversight evaluation, the CUPA did not provide a summary of violations/notice to comply to the business at the end of the inspection.</p> <p>As required by HSC 25187.8(a), an authorized representative of the department or local officer or agency, authorized to enforce this chapter pursuant to subdivision (a) of Section 25180, who, in the course of conducting an inspection of a facility, detects a minor violation of any permit, condition, rule, regulation standard, or other requirement, shall issue a notice to comply before leaving the site in which the minor violation is alleged to have occurred. Also HSC 25185(c) (1) restates that an inspector shall at the conclusion of an inspection deliver to the operator of the facility or site a written summary of all violations alleged by the inspector. The inspector shall, prior to leaving the facility or site, deliver the written summary to the operator and shall discuss any questions or observations that the operator might have concerning the inspection.</p>	<p>In the future, all SOV/NTC's are to be issued the day of inspection.</p>	<p>March 23, 2006</p>

18	While the former UST permit and conditions contained the required elements, the current UST permit and conditions does not contain all of the required elements. <i>T23 2712</i>	Develop a new UST permit and conditions containing the required elements as outlined in Title 23, Section 2712.	June 30, 2006
19	The CUPA does not base issuance of the UST operating permit on compliance, but on payment of fees.	Operating permits are to be issued after verification of compliance. Develop a procedure to ensure compliance with the UST requirements prior to issuance of the operating permit.	June 30, 2006
20	The CUPA does not review and approve monitoring, response and plot plans prior to permit issuance, and plans are not part of the permit. Only one of the files reviewed contained a monitoring and response plan.	Develop a procedure for reviewing and approving monitoring and response plans, and plot plans. Ensure that these items are part of the permit, and a copy is maintained in the facility file. Ensure through the inspection process that a current plan is maintained at the facility.	June 30, 2006

CUPA Representative

(Print Name)

(Signature)

Evaluation Team Leader

(Print Name)

(Signature)

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

1. **Observation:** The CUPA has training records exhibiting progressive training of past inspectors, but the CUPA does not have a detailed training plan in place for new and existing inspectors to follow.

Recommendation: Develop a training plan for new and existing inspectors to follow. The plan should include specific classes at designated times, classes that are pertinent to the types of inspections performed, and a mechanism for cross-training staff in the Unified Program elements.

2. **Observation:** As has been stated by the CUPA, the SWEEPS data management system has been difficult to use and has not been used as a day to day management of facility information. SWEEPS is marginally capable of indexing Business Plan files by street address and business name, as required by Health & Safety Code section 25506(a), the process is slow, non-intuitive and labor-intensive. The system has not been fully integrated into the Tuolumne County CUPA Program because of poor vendor support and lack of past implementation of SWEEPS.

Recommendation: Replace SWEEPS with newer Envision software for superior data management and vendor support. Incorporate Envision into CUPA day to day management of facility information, while continuing to maintain paper files. The proposal to incorporate global positioning satellite (GPS) information to the database would make response even better.

3. **Observation:** Due to a decline of a significant number of staff from the CUPA program in recent years, Tuolumne County Environmental Health has not had adequate personnel to effectively implement the CUPA program. The CUPA currently has one staff person (hired September 2004) who manages and implements the program. One other person is currently being cross-trained for the Unified Program, but Reuben Sendejas is the only person fully trained to perform CUPA inspections in all the program elements.

Recommendation: The CUPA should hire more staff fully dedicated to the CUPA program to increase overall CUPA efficiency and to increase inspection frequencies throughout all program elements.

4. **Observations:** The CUPA's only recent CalARP inspection did not look for compliance audits or incident investigations.

Recommendations: The three-year compliance audit and any incident investigations (especially "near misses") provide valuable information on the basic safety of the plant.

5. **Observation:** The CUPA was unable to demonstrate that complaints which were referred by DTSC from January 1, 2002 to February 1, 2005 were investigated. No follow-up documentation could be found for Complaints Nos. 04-1104-0640, 02-1202-0377, 02-

1202-0390, 02-1102-0366, 03-0503-0301, 03-0503-0317, 04-0304-0202, 03-0203-0117, 03-0203-0107, and 03-0203-0072.

Recommendation: Ensure that all complaints are being received by the CUPA from DTSC by providing the complaint coordinator the e-mail address of the person who should receive complaints. Investigate and document all complaints referred. Investigation does not always entail inspection, as many issues may be resolved by other means such as a phone call. In any instance, it is suggested that all investigations be documented, either by inspection report or by “note to file” and placed in the facility file. Please notify the complaint coordinator of the disposition of all complaints.

6. **Observation:** The inspection reports reviewed lacked any detailed narrative for the facilities inspected.

Recommendation: Develop the narrative portion of the inspection report so that a reviewer of the report may gain an insight into the type of historical operation occurring out at the site.

7. **Observation:** Inspection reports reviewed do not incorporate a thorough and comprehensive listing of generator requirements.

Recommendation: Please consider using the provided example checklist as a model in developing and modifying your own present inspection report. A comprehensive checklist included in the inspection report ensures that no rule, regulation, or statute is inadvertently overlooked.

8. **Observation:** The CUPA has not accessed the Hazardous Waste Tracking System of DTSC, which would have enabled the CUPA to determine the present number of facilities within its jurisdiction and to review their manifests before conducting a hazardous waste generator inspection.

Recommendation: Please begin accessing the Department’s Hazardous Waste Tracking System for future generator inspections to determine waste profiles and generation status from previous manifests sent. In addition, please review the print out provided to the Tuolumne County Environmental Health Department listing active facilities within its jurisdiction that have applied for permanent EPA ID numbers. Please compare the active facilities listings to your own database. A DTSC liaison may be contacted at 916-255-3649 for procedures on securing access to the database.

9. **Observation:** The inspector conducts a thorough UST inspection, but, the UST Inspection checklist is general in nature and does not fully reflect or address items that are inspected. The inspection checklist does not identify significant operational compliance (SOC) items. Compliance with SOC is not tracked for reporting purposes.

Recommendation: Develop and use a more comprehensive inspection checklist. A more developed checklist will create a more comprehensive and thorough inspection. Identify

SOC items on the checklist and track SOC compliance at the time of inspection for Report 6.

- 10. Observation:** Although the UST inspection report for the site inspected during this evaluation included a narrative describing the violations, what was needed to correct the violation, and a time frame for violation correction, the other files did not reflect these items. A formal inspection and enforcement procedure does not appear to be in place.

Recommendation: Develop a more comprehensive inspection report format. Provide a formal notice to comply (or notice of violation) that includes a summary of violations (including code sections), what is needed to correct the violation, and a time frame for correction. Incorporate these items into inspection and enforcement procedures.

- 11. Observation:** The records do not reflect when a violation is corrected, or if any or additional enforcement actions are taken.

Recommendation: Develop a procedure where violation correction can be tracked, or noted.

- 12. Observation:** File review of several files showed that many items were missing from the files: annual monitoring certifications and testing reports, installation records and construction inspection reports, upgrade records and construction inspection reports, financial responsibility records, designated operator designation, certificate of compliance, etc.

Recommendation: Ensure that construction records are maintained with the file. Annual testing results should be maintained for three years in the files.

EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

- 1.** Tuolumne County has community outreach for Household Hazardous Wastes. Citizens can dispose of cleaning products, paints, garden products, automotive products, etc. at Cal Sierra Transfer Station and the Recycling Center.
- 2.** The CUPA prints facts and information about the West Nile Virus, Radon, Emergency Preparedness, Hazardous Waste Enforcement (A Citizen's Guide), Tire Care and Safety, and Lead to educate the public.
- 3.** During the past reporting year the Environmental Health Staff have participated in training and exercises initiated and coordinated by the Public Health Department as a part of bio-terrorism response preparations. Keep up the coordination and good work.
- 4.** The single fee system is in place and functioning effectively for the CUPA programs. All of the fees that have been assessed have been collected.
- 5.** The Department employs a Fire Marshal and a fire inspector to help the CUPA in addressing fire code and hazmat issues; conducting inspections; and coordination of task force activities.